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also contended that Sec. 928, Va. Code 1904, did not sustain the refusal of the trial court, but was in aid of the constitutional provision already referred to, that a man has right to call for evidence in his behalf, and that as the defendant would have had the right to have been examined by any number of physicians privately, if she had been out on bail, that same right belongs to her when she was an inmate of the jail. The Supreme Court however, refused the writ of error, thereby settling the question in the negative. C. B. G.

Corporations—Foreign Corporations—Service of Process upon—
Sec. 1104, V a. Code 1904.—New Jersey has a statute similar to Sec. 1104, Va. Code 1904, which requires foreign corporations wishing to do business in the state to designate an agent to receive service of process in an action against the company. In *Groel v. The United Electric Co. (N. J., Ch.)*, 60 Atl. 822, it was held that service on the agent after the company had ceased to do business in the state gave the court jurisdiction over the corporation. In commenting upon this subject, the *Harvard Law Review*, vol. XIX., p. 52 says: "It seems clear that the termination of business dealings in the state need not ipso facto terminate the statutory agent's authority to receive service. In the absence of express provisions, however, such authority should not easily be implied. The company has submitted to the jurisdiction of the courts in return for the privilege of doing business in the state; when it voluntarily withdraws, the presumption would be that it has withdrawn for all purposes. A common class of statutes, however, provides for the designation of special agents—frequently state officers—other than the officers or business agents of the company, to receive service; and under these statutes some courts have held that jurisdiction over the company remains in respect of all liabilities incurred by the company while in the state. (Sustaining the jurisdiction, *Collier v. Mutual Reserve Fund Life Ass'n*, 119 Fed. Rep. 617; *Davis v. Kansas and Texas Coal Co.*, 129 Fed. Rep. 149. Contra, *Swann v. Mutual Reserve Fund Life Ass'n*, 100 Fed. Rep. 922; *Freedman v. Empire Life Insurance Co.*, 101 Fed. Rep. 535. See also, *Mutual Reserve Fund Life Ass'n v. Phelps*, 190 U. S. 147.) This was a result reached in a recent case decided in the New Jersey court of chancery. *Groel v. United Electric Co. of New Jersey*, 60 Atl. Rep. 822. Under substantially identical statutes the decisions are about equally divided. The view of the statute taken by the New Jersey court, however, appears reasonable, since, if jurisdiction were intended to continue only while the company remained in the state, provision for service on any persons other than the regular business agents of the company would scarcely be necessary.